

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**MARK WALTERS,**

Plaintiff,

v.

**OPENAI, L.L.C.,**

Defendant.

Case No. 1:23-cv-03122-MLB

**DECLARATION OF KATHY SON**

I, Kathy Son, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), that the following is true and correct:

1. I am Director of Equity Programs at OpenAI (“OpenAI”) and am competent to make this Declaration. In this role, I have first-hand knowledge of the identity and citizenship of OpenAI, L.L.C.’s members and constituent entities at the time that this case was filed. These members include individuals such as employees (past and current) and investors.

2. The facts set forth in this Declaration are based upon my personal knowledge and my review of documents which OpenAI maintains in the ordinary

course of its businesses. I would be willing and able to testify thereto if and when called upon to do so.

3. I conducted a diligent review, as described above, of OpenAI's business records in support of OpenAI L.L.C.'s past filings in this case, Dkt. 11 and 22. I reviewed the members of OpenAI L.L.C., including constituent entities and members thereof, at the time of this case's filing, and confirmed that none of those members resides in or is a corporate citizen of the State of Georgia.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 20, 2023, in San Francisco, California.

This 20th day of October, 2023.

DocuSigned by:  
*Kathy Son*  
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KATHY SON